



January 27, 1982

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368
1915 Southridge Drive
Jefferson City, Missouri 65102
(314) 751-3241

Mr. Ed Hughes
Nixdorff-Lloyd Chain Company
2500 East 1st Street
Maryville, MO 64468

Dear Mr. Hughes:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report for your facility. In addition to the recommendations of the inspection report the following item must be complied with. As of November 19, 1981, all owners or operators of hazardous waste management facilities with surface impoundments are required under 10 CSR 25-7.011(1)(D) and 40 CFR 265 subpart F to implement a ground water monitoring program capable of determining the facilities impact on the quality of the groundwater. Please provide this office with a groundwater monitoring plan by April 1, 1982.

Documentation that the other violations have been corrected should also be provided to this office and the Kansas City Regional Office by April 1, 1982. A reinspection will be conducted in the near future.

If you have any questions or if we can be of assistance to you, don't hesitate to contact either the regional office or Mr. Paul Meiburger of this office. TALKED TO PAUL ON WED. FEB 3, 82. HE SUGGESTED TO CALL THE GOV. PRINTING OFFICE BOOK STORE IN KANSAS CITY. PHONE 816-374-2161 FOR THE PUBLICATIONS NEEDED. IF WE NEED HELP- CALL HIM OR VIC GO-SWAMY FOR HELP.

Sincerely,
David E. Bedan

David E. Bedan, Ph.D.
Director
Waste Management Program

CALLER DR JIM WILLIAMS, Geologist,
AT THE EPA OFFICE IN ROLLA.
WED, FEB 17, HE WAS NOT IN.
HIS PHONE IS 314-364-1752

DEB/PM/bki

Enclosures

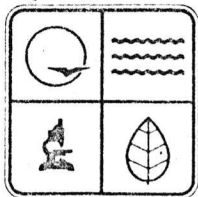
cc: Kansas City Regional Office
U.S. EPA Region VII Enforcement Branch



R00342876
RCRA RECORDS CENTER

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director



January 27, 1982

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Mr. Ed Hughes
Nixdorff-Lloyd Chain Company
2500 East 1st Street
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David E. Bedan, Ph.D.
Director
Waste Management Program

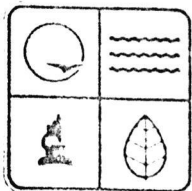
DEB/PM/bki

Enclosures

cc: Kansas City Regional Office
U.S. EPA Region VII Enforcement Branch

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director



3.600 Nodaway County
Nixdorff-Lloyd Chain Company

RECEIVED

NOV 13 1981

SOLID WASTE
MANAGEMENT PROGRAM

November 9, 1981

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

Nixdorff-Lloyd Chain Company
2500 East 1st Street
Maryville, Missouri 64468
(314) 421-2676

MO Generator ID#: 01515
MO Transporter ID#: None
EPA ID#: MOD099238784

INTRODUCTION

On August 31, 1981 Gene Holcomb and Mark Puett went to the Nixdorff-Lloyd Chain Company for an inspection under the Resource Conservation and Recovery Act of 1976. We were greeted by Mr. Ed Hughes of this company.

Nixdorff-Lloyd Chain Company produces bulk chain from pickled and drawn wire. The end product is hardware chain, automobile and truck tire chain. The product can be shipped as manufactured, or may be zinc electroplated.

The waste products from these processes are all spent solutions that have either got too dirty or have lost their cleaning ability. These wastes are spent pickle liquor (K062), 1.3 million pounds per year, electroplating bath sludge (F008), 500 pounds per year and the stripping and cleaning solutions from the electroplating process (F009), 13,250 pounds per year. All of these spent solutions are disposed of on site in a surface impoundment with a capacity of 683,000 gallons.

UNSATISFACTORY FEATURES

- 1.) The generator does not have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility.
- 2.) The generator's personnel have not completed a training program in hazardous waste management procedures.

Christopher S. Bond Governor
Fred A. Lafser Director
Kansas City Regional Office

MISSOURI DEPARTMENT OF NATURAL RESOURCES
615 East 13th Street Kansas City, Missouri 64106 (816) 274-6675

RCRA COMPLIANCE INSPECTION REPORT
3.600 Nodaway County
Nixdorff-Lloyd Chain Company

November 9, 1981
Page 2 of 3

- 3.) Job titles and a written description for each job title were not being used at the generator's facility.
- 4.) The facility does not have available a waste analysis plan.
- 5.) The facility does not keep a written inspection log and a written schedule for inspecting hazardous waste facilities and equipment.
- 6.) The facility does not have a written closure plan.
- 7.) There was evidence of leakage or overflow of the surface impoundment.
- 8.) The facility does not have restricted access signs posted at each entrance of the lagoon.

COMMENTS

This facility was very deficient in paper work concerning hazardous waste. All of these written documents should be prepared as soon as possible to be in compliance with the Resource Conservation and Recovery Act of 1976.

The surface impoundment had evidence of some leakage down a surface water course. There was no evidence of cracks in the surface impoundment, so it is assumed that the surface impoundment overflowed at some point in time.

The surface impoundment had a limited access fence around it, but did not have adequate restricted access signs posted at each entrance to the active portion of the facility.

RECOMMENDATIONS

- 1.) The Federal Register of May 19, 1980, 40 CFR 264 Subpart D states that each owner must have a contingency plan for his facility.
- 2.) 40 CFR 265.16 of the Federal Register requires a program of classroom instruction or on-the-job training teaching hazardous waste management procedures. Also, in this section, it requires job titles and a written description for each job title.
- 3.) 40 CFR 265.13 requires a general waste analysis plan for the facility.
- 4.) General inspection requirements including a written inspection log and a schedule for inspection is covered in 40 CFR 265.15.
- 5.) 40 CFR 265 Subpart G gives the requirements for closure plans for disposal facilities.
- 6.) Special precautions must be observed with the surface impoundment to prohibit any failures in this structure.
- 7.) Requirements for posting of signs on the fences of hazardous waste facilities is in 40 CFR 265.14.

RCRA COMPLIANCE INSPECTION REPORT
3.600 Nodaway County
Nixdorff-Lloyd Chain Company

November 9, 1981
Page 3 of 3

These deficiencies should be corrected by April 1, 1982. If they are prepared before this time, please send copies to this office.

REPORT BY:

APPROVED BY:

Mark Puett
Mark Puett
Environmental Engineer

William E. Hills
William E. Hills
Regional Administrator

cc: Central Office, SWMP

RCRA CHECKLIST FOR INSPECTION OF GENERATORS

Name of Facility: Nixdorff Lloyd Chain Co.
 Address: 2500 East 1st St.
Maryville Mo 64468
 EPA Generator ID Number: MO0099238784
 Facility Inspection Representative: Ed Hughes
 Title: Mech. Desr.
 Telephone Number: 314 421 2676

EO USE

Inspection file

No. _____

Reviewer _____

Date reviewed: _____

Form "A"

ert. Regs.
 O C.F.R.
 art:

1. Please provide a brief narrative explaining the type of work activity that occurs at the generator.

This plant produces bulk chain
From pickled & drawn wire.

2. Does the generator dispose of its wastes....

A. On-site

(Circle one or both)

B. Off-site

Note: if on-site, then checklist for both a generator and TSD facility must be completed if on-site more than 90 days.

3. What is the amount of hazardous waste (in kilograms) produced by the generator facility in a month? 50,000 kg/in a year
 (If the amount is less than 1,000 kg/month, then the facility qualifies as a small generator and Form C should be completed instead of Form A.)

4. What categories of hazardous wastes result from the generator's facility? Please circle:

A. Ignitable wastes

Yes

No

B. Reactive wastes

Yes

No

C. Corrosive wastes

Yes

No

D. EP Toxic wastes

Yes

No

E. RCRA Listed Waste

5. Is the generator presently...

Circle one

A. Treating hazardous waste?

Yes ☒ No

B. Storing hazardous waste?

Yes ☒ No

C. Disposing hazardous waste?

☒ Yes No

Note: if the generator performs any of the activities noted in Question 5, then the inspector must complete Form B, entitled "RCRA Checklist for inspection of hazardous waste treatment, storage and disposal facilities."

6. Is a manifest system currently in operation at the generator's facility so that offsite shipment of hazardous wastes can be tracked?

Yes ☒ No

7. Please inspect the generator's manifest for the following information:

Not Needed

A. Is the TSD facility which receives a generator's hazardous waste identified by name, address, and EPA ID number?

Yes No

B. Is an alternative facility designated in case of an emergency?

Yes No

C. Is a serialized manifest document number included on the form?

Yes No

D. Is the generator's name, address, telephone number and EPA ID number included on the form?

Yes No

E. Is the name and identification number of each transporter included on the form?

Yes No

F. Is a description of the generator's hazardous waste to be treated, stored, or disposed included on the manifest?

Yes No

G. Is the quantity of each waste by units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form?

Yes No

H. Is the following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature?

"This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA."

Yes No

I. Are there adequate copies of the manifest available for generator, transporter, and TSD's?

Yes No

8. Is hazardous waste being stored on-site by the generator for less than 90 days?

Not stored

Yes ☒ No

If so,

A. Is the date accumulation of waste began clearly marked on each storage container?

Yes No

- 34(a)(2) B. Are storage containers in good condition, i.e., no corrosion, leaking, or structural deformations? Yes No
- 34(a)(4) C. At the time of accumulation, are the storage containers clearly labeled as containing a particular hazardous waste in accordance with DOT regulations? Yes No
9. Does the generator have an established contingency plan to deal with emergencies that may impact hazardous waste currently in storage at the facility? Yes No
- 16(a) 10. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes No
- 16(d) 11. Does the generator facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes No
- 16(d)(2) 12. Does the generator facility have on record a written position description for each job title noted in Question #11? Yes No
- 16(d)(3) 13. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #11? - Yes No
- 32(a) 14. *Does the generator facility have installed the following equipment:
- A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes No
- B. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? Yes No
- C. Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? Yes No
- 35 15. *Does the generator facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? NOT NEEDED Yes No
- 5.50 16. Does the facility have a contingency plan which contains the following elements:
- 5.52(c) A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? Yes No
- 5.52(d) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? Yes No

5.52(d)

C. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators?

Yes

☒ No

Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis.

5.52(e)

D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility?

Yes

☒ No

5.52(f)

E. *An evacuation plan for the generator facility if Management believes such a plan is a definite requirement for their particular generator facility.

Yes

☒ No

17. Please provide detailed comments on specific problems encountered during the inspection. For instance, industry requests for clarification of specific RCRA rules and regulations and their applicability at the facility can be noted below or described in a separate memo attached to the inspector's checklist.

Inspector's Name: Mark Piretti & Gene Holcomb

Title: Environmental Engineers

Agency: MDNR

Office location: KCRC

Date of Inspection: _____

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA CHECKLIST FOR INSPECTION OF TSD FACILITIES

RO USE

Name of Facility: Nixdorf-Lloyd Chain Co.

Inspection File

Address: 2500 E. 1st St.

No. _____

Maryville Mo 64468

Reviewer _____

EPA TSD ID Number: MO D099238784

Date reviewed _____

Facility Inspection Representative: _____

Form "B"

Title: _____

Telephone: 314 421 2676

SITE CHARACTERIZATION

(Please denote if the facility presently treats, stores, or disposes of hazardous waste. Also, mark the appropriate sub-category that occurs at the particular facility.)

TREATER

STORER

DISPOSER

☐ Filtration
☐ Incineration
☐ Thermal Reduction
☐ Recycling/Recovery
☐ Chem/Phys/Bio Treatments
☐ Waste Oil
☐ Reprocessing
☐ Solvent Recovery
☐ Other _____

☐ Open Pile
☐ Surface Impoundment
☐ Drum
☐ Above ground tank(s)
☐ Below ground tank(s)
☐ Other _____

☐ Landfill operation
☐ Land treatment
☐ Surface Impoundment
☐ Incineration
☐ Other _____

INSPECTION PROCEDURE

1. Does the facility generate hazardous wastes?

Yes ☒ No

Note: Please complete the generator's checklist if TSD facility generates hazardous wastes which are disposed off-site.

- 13(b) 2. Does the facility have in place a waste analysis plan?

Yes No ☒

If so,

- 13(a) A. Does the plan enable facility personnel to identify hazardous wastes being handled by the facility?

Yes No

- 13(c) B. Does the plan enable facility personnel to confirm that wastes actually received at the TSD facility are the wastes indicated on the generator's manifest form?

Yes No

3. *Does the TSD facility have a 24-hour surveillance system which monitors and controls entry to the active portion of the facility?

Yes No ☒Not exact

- A. If not, does the facility have an artificial or natural boundary which surrounds active portions of the facility and, Yes No
- B. A means to control entry at all times, i.e., gates, attendants, locked entrances, etc.? Yes No
- .14 (c) 4. *Does the TSD facility have a restricted access sign posted at each entrance to the active portion of the facility? (An example would be: "Danger - Unauthorized Personnel Keep Out!") Yes No
- If so,
- A. Is the sign legible from a distance of 25 feet? Yes No
- B. Is the sign in English or any other foreign language predominant to the geographical area? Yes No
- .15(d) 5. Does the TSD facility have an inspection log and a written .15(b) schedule for inspecting all emergency equipment, security devices, and operating and structural equipment, important to the prevention, detection or response to environmental/human health emergencies? Yes No
- .16(a) 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? Yes No
- .16(d) 7. Does the TSD facility maintain a record of job titles for personnel that are involved with hazardous waste management and the name of the employee filling each job? Yes No
- .16(d)(2) 8. Does the TSD facility have on record a written position description for each job title noted in Question #6? Yes No
- .16(d)(3) 9. Does the facility presently maintain a written description of the type and amount of introductory and continuing training for those employees noted in Question #6? Yes No
- .32(a) 10. *Does the TSD facility have installed the following equipment:
- A. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? Yes No
- B. A device at the scene of hazardous waste TSD operations capable of summoning emergency assistance from Police, Fire departments, etc.? Yes No
- C. Fire control equipment and an adequate supply of fire fighting water or fire suppression chemicals? Yes No
- .35 11. *Does the TSD facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? Yes No

- 5.50 12. Does the facility have a contingency plan which contains the following elements:
- 5.52(c) A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? Yes ☒ No
- 5.52(d) B. A detailed description of arrangements formally agreed to by local police, fire departments, and State and local emergency teams to provide assistance during emergency situations? Yes ☒ No
- 5.52(d) C. A listing of names, addresses, and phone numbers of the TSD facility emergency response coordinators?
Note: This listing should include names and phone numbers of emergency coordinators available on twenty-four hour basis. Yes ☒ No
- 5.52(e) D. A list of appropriate emergency equipment necessary to cope with emergencies at the TSD facility? Yes ☒ No
- 5.52(f) E. *An evacuation plan for the TSD facility if Management believes such a plan is a definite requirement for their particular TSD facility? Yes ☒ No
- 5.55 13. Does the facility have at all times at least one employee either on-call or on the site who is responsible for coordinating all emergency response measures? Yes No
- If so, please complete below:
- Name: _____
- Title: _____
- Telephone Number: _____
- 55.73 14. Does the TSD facility have a written operating record which contains the following information:
- 55.73(b)(1) A. A description and the quantity of each hazardous waste received and the method and date of treatment, storage or disposal? Yes ☒ No
- 55.73(b)(2) B. The location of each hazardous waste within the facility and the quantity at each location? Yes No
- 55.73(b)(3) C. Detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? Yes No
- 55.73(b)(4) D. Detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? Yes No
- 55.73(b)(5) E. Detailed records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas? Yes No

5.73(b)
(6)

F. Detailed monitoring, testing, and analytical data to insure compliance with the regulations?

Yes No

15. Have the TSD facility operators initiated the preparation of written closure and post closure plans in order to meet the May 1981 target date for implementation of these requirements?

Yes ☒ No

5.71

16. Does the TSD facility receive hazardous waste from off-site generators?

Yes No

If yes, are the following procedures implemented:

A. Manifest copies are signed and dated

Yes No

B. A copy is given to the transporter

Yes No

C. A copy is sent to the generator

Yes No

D. A copy is returned and filed at the TSD facility

Yes No

Note: These requirements do not pertain to onsite facilities unless such facilities also receive hazardous wastes from off-site sources.

5.90
0

17. Has the owner or operator implemented a groundwater monitoring program if surface impoundments, landfills or land treatment technologies are utilized at the facility?

Yes No

Note: Plan not required until one year after effective date of regulations..

18. The inspector should check for the following conditions at the TSD facility:

A. Open fires

Yes ☒ No

B. Fumes or gases

Yes ☒ No

C. Leaks or corrosion in containers or other storage structures

Yes ☒ No

D. Leachate to receiving streams

Maybe ☒ Yes ☒ No

E. Malfunction of equipment

Yes ☒ No

F. Bulging drums

Yes ☒ No

G. Excessive heat generation from storage facilities, lagoons, storage piles, etc.

Yes ☒ No

This image shows a single sheet of white paper with horizontal black ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist for Small Quantity Generators of Hazardous Waste

R.O. USE

Inspection file No: _____

Name of Facility: _____

Address: _____

Reviewer: _____

Generator ID Number: _____

Date Reviewed: _____

Facility Inspection Representative: _____

Form "C"

Telephone: _____

Telephone Number: _____

Questions contained in this checklist apply to owners and operators who have notified small quantity generators (less than 1000 kg per month).

1. What types of waste are generated at the facility and the quantity of each per month (in kilogram).

_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____

2. Which of the wastes listed above are recycled/reclaimed and the quantity of each per month (in kilograms)?

_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____
_____ / _____	_____ / _____	_____ / _____

3. Is the amount of hazardous waste accumulated per month greater than:

a. 1000 kilograms/mo.?	Yes	No
b. 1 kilogram/mo.? (for acute storage)	Yes	No
c. 100 kilograms/mo.? (for debris storage)	Yes	No

4. If any of the answers in Question No. 3 are yes, then is the generator complying with Part 262.34 requirements? Yes No
5. Is hazardous waste delivered to an "on" or "offsite" facility which is:
- a. permitted under Part 122 of the RCRA regulations? Yes No
 - b. a RCRA interim status facility? Yes No
 - c. authorized by the State with a RCRA program according to Part 123 of the RCRA regulations? Yes No
 - d. licensed by the State? Yes No
 - e. a "beneficial use" or reuse/recycle facility? Yes No
 - f. a treater of hazardous waste prior to beneficial use, reuse or recycle? Yes No
6. Please list the name, address and EPA ID number (if available) for each of the facilities where wastes are disposed (refer to Question No. 5).

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

Inspector's Name: _____

Title: _____

Agency: _____ Office location: _____

Date of Inspection: _____

RCRA Checklist for Surface Impoundments

R.O. USE

Subpart F Section 265.222 "General Operating Requirements"

Inspection file No: _____

Name of Facility: _____

Reviewer: _____

Address: _____

Date Reviewed: _____

Generator ID Number: _____

Facility Inspection Representative: _____

Form "K"

Telephone: _____

Telephone Number: _____

Questions contained in this checklist apply to owners and operators of facilities that use surface impoundments to treat, store, or dispose of hazardous waste, except as Part 261.1 provides otherwise.

RCRA Regs.
C.F.R.
Part:

- | | | |
|------------------------|--|--|
| 222 | 1. Is 2 ft. of freeboard maintained in the surface impoundment? | Yes <input checked="" type="radio"/> No <input checked="" type="radio"/> |
| 223 | 2. Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? | Yes <input checked="" type="radio"/> No <input type="radio"/> |
| 225(a)
(1) &
(2) | 3. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? | Yes <input checked="" type="radio"/> No <input type="radio"/> |
| 226(a)
(1) | 4. Is the freeboard level inspected at least once each operating day? | Yes <input type="radio"/> No <input checked="" type="radio"/> |
| 226(a)
(2) | 5. Is the surface impoundment, including dikes and vegetation, inspected once per week to detect leaks or deterioration or failures in the impoundment? | Yes <input checked="" type="radio"/> No <input type="radio"/> |
| | 6. Are the results of these inspections recorded in an inspection log or summary? | Yes <input type="radio"/> No <input checked="" type="radio"/> |
| 229(a) | 7. Are ignitable or reactive wastes stored in a surface impoundment: If so, | Yes <input type="radio"/> No <input checked="" type="radio"/> |
| 229(a)
(1) | a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under parts 261.21 or 261.23 of the RCRA regulations? | Yes <input type="radio"/> No <input type="radio"/> |

230

b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided?

Yes

No

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

RCRA Checklist for Chemical, Physical and Biological Treatment

(Subpart Q Part 265.40 - "General Operating Requirements")

R.O. USE

Inspection file No: _____

Name of Facility: _____

Reviewer: _____

Address: _____

Date Reviewed: _____

EPA Generator ID Number: _____

Form "Q"

Facility Inspection Representative: _____

Title: _____

Telephone Number: _____

The questions contained in this checklist apply to owners and operators of facilities which treat hazardous wastes by chemical, physical, or biological methods in other than tanks, surface impoundments and land treatment facilities except as Section 265.1 provides otherwise.

ert. Regs.
O C.F.R.
art:

- | | | |
|--------------------|--|-----------|
| 65.401(b) | 1. Are all treatment processes or equipment in good condition, i.e., not showing signs of leakage, corrosion or any other deterioration? | Yes No |
| 65.401(c) | 2. Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop this inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) | Yes No |
| 65.402(1)
& (2) | 3. Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? | Yes No |
| | 4. Is this information recorded in the facility's operating record? | Yes No |
| 65.403(a)
(1) | 5. Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cut-off systems, drainage systems and pressure relief systems)? | Yes No |
| 65.403(a)
(2) | 6. Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? | Yes No |
| 65.403(a)
(3) | 7. Are construction materials of the treatment process or equipment and immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? | Yes No |

8. Are the results of these inspections recorded in an inspection log or summary?

Yes No

9. Are ignitable or reactive wastes placed in a treatment process? If so,

Yes No

405(a)
(1)

A. Are the wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA regulations?

Yes No

405(a)
(1)

B. Are the wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?

Yes No

10. Are incompatible wastes kept from being placed in the same treatment process or equipment?

Yes No

Inspector's Name: _____

Title: _____

Agency: _____

Office Location: _____

Date of Inspection: _____

Inspector's Name: _____

Title: _____

Agency: _____

Office Location: _____

Date of Inspection: _____

RCRA Checklist for Use and Management of Containers
(Subpart I Section 265.170 - "General Operating Requirements")

R.O. USE

Inspection file No: _____

Name of Facility: _____

Reviewer: _____

Address: _____

Date Reviewed: _____

EPA Generator ID Number: _____

Facility Inspection Representative: _____

Form "1"

Title: _____

Telephone Number: _____

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

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|--------------------|---|-----|----|
| 5.171 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? | Yes | No |
| 5.171 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | Yes | No |
| 5.173(a) | 3. Are all containers holding hazardous waste kept closed during storage? | Yes | No |
| 5.174 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week? | Yes | No |
| 5.15(d)
5.15(b) | 5. Is an inspection log maintained? (See question #5 of TSD checklist.) | Yes | No |
| 5.176 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? | Yes | No |
| 5.177(a) | 7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.) | Yes | No |
| 5.177(c) | 8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? | Yes | No |

Inspector's Name: _____

Title: _____

Agency: _____

Office location: _____

Date of Inspection: _____

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